

1 Martha G. Bronitsky
Chapter 13 Standing Trustee
2 Po Box 5004
Hayward, CA 94540
3 (510) 266 - 5580

4 Trustee for Debtor(s)

5 UNITED STATES BANKRUPTCY COURT
6 NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

7
8 In re

Maria Rhea Ramilo Marin

Chapter 13 Case No. 15-43468-WJL13

9
10 debtor(s)

11 **Trustee's Motion and Declaration to**
12 **Dismiss or Convert Proceedings and Notice Thereon**

13 TO DEBTOR(S) AND DEBTOR(S)' ATTORNEY OF RECORD:

14 Martha G. Bronitsky, Chapter 13 Standing Trustee hereby moves the court for an Order
15 Dismissing or converting these proceedings upon the grounds that after a recent audit of this case,
16 the plan is clearly unfeasible. Based on the claims filed the case will run 67.00 months. This is 7
17 over 60, the months per the confirmed plan.

18
19 NOTICE IS HEREBY GIVEN that debtor or the attorney of record may request a hearing in
20 writing stating specific grounds for objecting to the dismissal or conversion of these proceedings to
21 the court and served on the trustee no later than twenty-one (21) days from the date of service of
22 this motion. Trustee will then schedule a hearing date and notice debtor and the attorney of record
23 of said hearing date.

24 I declare under penalty of perjury that the foregoing is true and correct.

25
26 Date: November 20, 2017

/s/ Martha G. Bronitsky

27 Signature of Martha G. Bronitsky
28 Chapter 13 Standing Trustee

1 In re

2 Maria Rhea Ramilo Marin
3 debtor(s)

Chapter 13 Case No. 15-43468-WJL13

4 CERTIFICATE OF SERVICE

5 I HEREBY CERTIFY that I have served a copy of the within and foregoing document on the
6 debtor (s), counsel for debtor (s), and if applicable, the creditor, creditor representatives and the
7 registered agent for the creditor by depositing it in the United States mail with first class
8 postage attached thereto.

9 I declare under penalty of perjury under the laws of the State of California that the foregoing is
10 true and correct.

11 Maria Rhea Ramilo Marin
12 39800 Fremont Blvd #163
13 Fremont,CA 94538

(Debtor(s))

Patrick L Forte Atty
1624 Franklin St #911
Oakland,CA 94612

(Counsel for Debtor)

14 Date: 11/20/2017

15 /s/ OLGA GONZALEZ
16 OLGA GONZALEZ